

In their filing today, Plaintiffs have submitted new evidence in the form of a Declaration of M. Christy McManus, dated September 17, 2021, and a new proposed order “which has been revised for purposes of clarity in scope.” [Dkt. 59 at 1-2]

The United States does not view the McManus declaration or revised proposed order as timely or material, and therefore the Government does not intend to respond to Plaintiffs’ filing unless the Court believes that would be helpful, in which case the Government will provide a response as directed (likely tomorrow, given the many pertinent CBP personnel working in the Eastern Time Zone). The United States stands ready to respond as directed by the Court.

RESPECTFULLY SUBMITTED this 20th day of September 2021, in Anchorage, Alaska.

E. BRYAN WILSON
Acting United States Attorney

s/ Seth M. Beausang
Assistant U.S. Attorney
Attorney for the Defendant

CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2021,
a copy of the foregoing was served electronically on:

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